

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

Gupta, Bhagwan  
Plaintiff

**FILED**  
MAR 17 2020  
CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY                     , DEPUTY

-VS- Case No. CIV-18-317-PRW  
Oklahoma City Public Schools  
Defendant

Plaintiff's Objections to District's Motions in Limine and Brief in  
Support:

**INSURANCE:**

Plaintiff has no comments as he has no understanding of the subject  
and shall abide by Honorable Court decision, instructions and  
directions.

**Documents relating to Plaintiff's Oklahoma Employment  
Security Commission ("OESC") Claim:**

Documents relating to OESC proceedings pass the test for relevant evidence  
FRE 401 as they have tendency to make facts more or less probable than it  
would be without the evidence and the facts are of consequence in  
determining the action.

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Documents relating to OESC Proceedings also pass the test of General Admissibility of Relevant Evidence FRE 402 as United States Constitution, any Federal Statute, Federal Rules of Evidence and any other rules prescribed by the Supreme Court do not provide otherwise.

Plaintiff requests Honorable Court to kindly deny Defendant request to exclude OESC documents.

## **Punitive Damages against District, A Political Subdivision**

District's request to Honorable Court to exclude any testimonial or documentary evidence proffered by Plaintiff or any witness regarding Plaintiff's alleged entitlement to punitive damages against district is unjustified.

A Plaintiff can seek punitive damages against a school district on a successful claim brought under 42 U.S.C. section 1983. ( Monnell Liability, 436 U.S. 658, 691)

## **Irrelevant, Duplicative and Cumulative Exhibits**

Plaintiff Exhibit List had been discussed and revised in consultation with Defendant (except for OESC related exhibits). Plaintiff final Pretrial report was submitted to Mr. Justin Defendant Attorney along with Revised Plaintiff Exhibit

list on March 2, 2020 for inclusion in joint final pretrial report.

There were some discrepancies in the Plaintiff portion in the report sent to Honorable Court. It may have been due to some misunderstanding in communication. Final Exhibits and List of Exhibits have been exchanged.

## Newspaper Clippings regarding Discipline Issues in Oklahoma City Public Schools.

The evidence was presented to defendant and has been presented again along with final exhibits. These are relevant under FRE 401, FRE 402 as these clippings give insight into overall general atmosphere regarding student discipline, open fight in weekly meetings between different groups because of District being under investigation by Federal Department of Education for discriminatory discipline practices.

Plaintiff requests Honorable Court to allow the clippings as admissible Evidence.

## IRRELEVANT WITNESSES

Mr. Mathew Emde: Plaintiff has been charged of not following Teacher instructions and lesson Plans. Mr. Emde has personal knowledge. He has the Personal Knowledge if his instructions were followed, He also has personal Knowledge of attendance, grades, worksheets. He has thus direct personal knowledge of items which eventually contributed to adverse action.

Ms. Shannon Freeman, Director Recruitment and Ms. Slaughter, District

Plaintiff was accused of attending training uninvited. These officials must have Personal knowledge of reason of Plaintiff's presence in training session.

**Sign Here:**

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